



United States District Court
Southern District of Texas
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT
HOUSTON DIVISION

DEC - 6 2011

David J. Bradley, Clerk of Court

H-11-4216
CIVIL NO. _____

UNITED STATES OF AMERICA, §
ex rel. Tramell Kukoyi §
§
STATE OF CALIFORNIA, ex rel. §
Tramell Kukoyi; §
STATE OF COLORADO, ex rel. §
Tramell Kukoyi; §
STATE OF CONNECTICUT, ex rel. §
Tramell Kukoyi; §
STATE OF GEORGIA, ex rel. §
Tramell Kukoyi; §
STATE OF ILLINOIS, ex rel. §
Tramell Kukoyi; §
STATE OF MARYLAND, ex rel. §
Tramell Kukoyi; §
STATE OF MASSACHUSETTS, ex rel. §
Tramell Kukoyi; §
STATE OF MICHIGAN, ex rel. §
Tramell Kukoyi; §
STATE OF NORTH CAROLINA, ex rel. §
Tramell Kukoyi; §
STATE OF TENNESSEE, ex rel. §
Tramell Kukoyi; §
STATE OF TEXAS, ex rel. §
Tramell Kukoyi; §
STATE OF WISCONSIN, ex rel. §
Tramell Kukoyi; and Doe States 1 – 22, §
ex rel. Tramell Kukoyi, §

Plaintiffs, §

v. §
SavaSeniorCare, L.L.C.; §
Woodwind Lakes Health & Rehabilitation §
Center; SSC Houston Woodwind Operating §
Company, L.L.C.; SSC LP Holdings; §
SSC Houston Woodwind Operating GP, §
L.L.C.; SSC Submaster Holdings, L.L.C.; §
SSC Equity Holdings, L.L.C.; §
SavaSeniorCare Administrative Services, §
L.L.C.; SVCare Holdings, L.L.C.; Canyon §
Sudar Partners; Leonard Grunstein; Murray §

RELATOR TRAMELL KUKOYI'S
ORIGINAL COMPLAINT PURSUANT
TO 31 U.S.C. §§ 3729 – 3723
FEDERAL FALSE CLAIMS ACT
AND STATES' FALSE CLAIMS ACTS
AND PENDANT CLAIMS

FILED IN CAMERA
AND UNDER SEAL

JURY TRIAL DEMANDED

Forman; SavaSeniorCare, L.L.C.; §
 Alpine Living Center; SSC Thorton §
 Operating Company, L.L.C.; Alpine §
 Terrace; SSC Kerrville Alpine Terrace §
 Operating Company, L.P.; Anderson §
 Mill Health and Rehabilitation Center; §
 SSC Austell Operating Company, §
 L.L.C.; Applewood Living Center; §
 SSC Longmont Operating Company, §
 L.L.C.; Arcola Health and Rehabilitation §
 Center; SSC Fort Worth Nursing & §
 Rehabilitation Center Operating Company, §
 L.P.; Arlington Heights Health and §
 Rehabilitation Center; SSC Fort Worth §
 Nursing & Rehabilitation Center Operating §
 Company, L.P.; Ashland Health and §
 Rehabilitation Center; SSC Ashland §
 Operating Company, L.L.C.; Aspen §
 Living Center; SSC Colorado Springs §
 Aspen Operating Company, L.L.C.; §
 Bangs Nursing Home; SSC Bangs §
 Operating Company, L.P.; Bastrop Nursing §
 Center; SSC Bastrop Operating Company, §
 L.P.; Bay Villa Health Care Center; SSC §
 Bay City Operating Company, L.P.; Bel §
 Air Health and Rehabilitation Center; SSC §
 Bel Air Operating Company, L.L.C.; §
 Belmont Lodge Health Care Center; §
 SSC Pueblo Belmont Operating, Company §
 L.L.C.; Berthoud Living Center; SSC §
 Berthoud Operating Company, L.L.C.; §
 Bethesda Health and Rehabilitation Center; §
 SSC Bethesda Operating Company, L.L.C.; §
 Boulder Manor; SSC Boulder Operating §
 Company, L.L.C.; Brazosview Healthcare §
 Center; SSC Richmond Operating §
 Company, L.P.; Brian Center Health & §
 Rehabilitation / Brevard; SSC Brevard §
 Operating Company, L.L.C.; Brian Center §
 Health & Rehabilitation / Canton; SSC §
 Canton Operating Company, L.L.C.; Brian §
 Center Health & Rehabilitation / Durham; §
 SSC Durham Operating Company, L.L.C.; §
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 Goldsboro; SSC Goldsboro Operating §
 Company, L.L.C.; Brian Center Health & §

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Rehabilitation / Hendersonville; SSC §
 Hendersonville Operating Company, §
 L.L.C.; Brian Center Health & §
 Rehabilitation / Hickory East; SSC §
 Hickory East Operating Company, §
 L.L.C.; Brian Center Health & §
 Rehabilitation / Spruce Pine; SSC Spruce §
 Pine Operating Company, L.L.C.; Brian §
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 Company, L.L.C.; Brian Center Health & §
 Rehabilitation / Wallace; SSC Wallace §
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 Health & Rehabilitation / Waynesville; §
 SSC Waynesville Operating Company, §
 L.L.C.; Brian Center Health & §
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 Brian Center Health & Rehabilitation / §
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 Company, L.L.C.; Brian Center Health §
 & Retirement / Cabarrus; SSC Concord §
 Operating Company, L.L.C.; Brian Center §
 Health & Retirement / Monroe; SSC §
 Monroe Operating Company, L.L.C.; §
 Brian Center Health & Retirement/ §
 Mooresville; SSC Mooresville Operating §
 Company, L.L.C.; Brian Center Health §
 & Retirement / Winston Salem; §
 SSC Winston-Salem Operating Company, §
 L.L.C.; Brian Center Health and §
 Rehabilitation / Gastonia; SSC Gastonia §
 Operating Company, L.L.C.; Brian Center §
 Health and Rehabilitation Hickory §
 Viewmont; SSC Hickory 13th Operating §
 Company, L.L.C.; Brian Center Health and §
 Rehabilitation / Charlotte; SSC Charlotte §
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 Health and Rehabilitation / Hertford; SSC §

RELATOR TRAMELL KUKOYI'S
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Hertford Operating Company, L.L.C.; §
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 Salisbury; SSC Salisbury Operating §
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 Operating Company, L.L.C.; Brian Center §
 Nursing Care / Lexington; SSC Lexington §
 Operating Company, L.L.C.; Brian Center §
 Nursing Center / Shamrock; SSC Charlotte §
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 Brian Center / Charlotte Retirement §
 Apartments; SSC Charlotte Retirement §
 Operating Company, L.L.C.; Bride Brook §
 Health and Rehabilitation Center; SSC §
 Niantic Operating Company, L.L.C.; §
 Cambridge East Healthcare Center; SSC §
 Oakland Cambridge Operating Company, §
 L.L.C.; Cambridge North Healthcare Center; §
 SSC Clawson Operating Company, L.L.C.; §
 Cambridge South Healthcare Center; SSC §
 Beverly Hills Operating, Company L.L.C.; §
 Care Inn of La Grange; SSC Lagrange §
 Operating Company, L.P.; Cedar Crest; §
 SSC Montgomery Cedar Crest Operating §
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 Center; SSC Colorado Springs Cedarwood §
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 Clinton-Aire Healthcare Center; SSC §
 Clinton Township Operating Company, §
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 Deer Creek of Wimberley; SSC Wimberley §
 Operating Company, L.P.; Diamond Ridge §

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HealthCare Center; SSC Pittsburg §
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 Fort Worth Downtown Operating, §
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 First Colony Health and Rehabilitation §
 Center; SSC Missouri City Operating §
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 Lemay Avenue Operating Company, §
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Hilltop Village Nursing and Rehabilitation §
 Center; SSC Kerrville Hilltop Village §
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 SSC Goldthwaite Operating Company, L.P.; §
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 Huntington Health and Rehabilitation §
 Center; Seventeenth Street Associates, §
 L.L.C.; Interlochen Health and §
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 Place; SSC Weatherford Peach Tree §
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 Silver Stream Health and Rehabilitation §
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 Company, L.L.C.; Spring Branch §
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RELATOR TRAMELL KUKOYI'S
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Branch, L.P.; Spring Creek Healthcare §
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 Operating Company, L.L.C.; Sterling §
 Living Center; SSC Sterling Operating §
 Company, L.L.C.; Summit Park Health §
 and Rehabilitation Center; SSC §
 Catonsville Operating Company, L.L.C.; §
 Sumter East Health and Rehabilitation §
 Center; SSC Sumter East Operating §
 Company, L.L.C.; Sunset Manor; SSC §
 Brush Sunset Manor Operating Company, §
 L.L.C.; Superior Woods Healthcare §
 Center; SSC Superior Township §
 Operating Company, L.L.C.; Sweeny §
 House; SSC Sweeny Operating Company, §
 L.P.; Tarzana Health and Rehabilitation §
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 L.P.; Terrace Gardens Healthcare Center; §
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 Company, L.P.; Westchester Health and §
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 Operating Company, L.L.C.; Wilmington §
 Health and Rehabilitation Center; SSC §
 Wilmington Operating Company, L.L.C.; §
 Winchester Lodge Healthcare Center; SSC §
 Alvin Operating Company, L.P.; Windsor §
 Healthcare Center; SSC Windsor Operating §

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Company, L.L.C.; Yuma Life Care Center; §
SSC Yuma Operating Company, L.L.C.; §
Omnicare Inc.; Transcare EMS; Intercare §
Health Services, Inc.; Igor Baranovski; and §
Olga Baranovski, §

Defendants.

RELATOR TRAMELL KUKOYI'S ORIGINAL COMPLAINT

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